

May 27, 2008

Federal Trade Commission/Office of the Secretary Room H-135 (Annex S) 600 Pennsylvania Avenue, NW Washington, DC 20580.

Re: Business Opportunity Rule, R511993

Dear:

I am writing regarding the Federal Trade Commission's (FTC) Revised Proposed Business Opportunity Rule, R511993. We appreciate the FTC's good faith efforts to consider the views of thousands of direct sellers and concur with your conclusion that revisions to the originally proposed rule were necessary to exempt legitimate direct sellers from coverage.

As a direct selling company and member of the Direct Selling Association, FreeLife International recognizes and supports the FTC's important consumer protection role and shares your commitment to protect the public from unfair and deceptive business practices that undermine consumer confidence in legitimate business enterprises such as our own.

We also fully concur with the comments and suggestions submitted to the FTC by the Direct Selling Association, and trust that you will incorporate these helpful recommendations as you work to perfect, clarify, and implement the improved and revised business opportunity rule. In particular, we recommend that the "required payment" element of the proposed revised rule be modified to exclude payments for the purchase of reasonable amounts of inventory, not for profit materials, supplies, and equipment (business kits).

We appreciate your consideration of our views, and if you require additional information, please do not hesitate to contact me.

Raymond Faltinsky
Chief Executive Officer